



Avista Corp.

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February 19, 2016

State of Idaho
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702-5983

Attention: Ms. Jean Jewell, Secretary

RE: AVU-E-16-02, Avista Response to Summons Issued February 1, 2016

Dear Ms. Jewell:

Enclosed is an original and seven (7) copies of Avista's response to the Summons issued on February 1, 2016 in Docket AVU-E-16-02 regarding the formal complaint filed by Mel E. Wach, owner of Yes Mortgage.

Please contact myself at the number below or Shawn Bonfield at (509) 495-2782 with any questions related to this filing.

Sincerely,

A handwritten signature in blue ink, reading "Linda Gervais", is positioned below the "Sincerely," text. The signature is fluid and cursive, with a long, sweeping line extending from the end of the name.

Manager of Regulatory Policy
Avista Utilities
linda.gervais@avistacorp.com
509-495-4975

Enclosures

RECEIVED
2016 FEB 22 AM 9:51
IDAHO PUBLIC
UTILITIES COMMISSION

David Meyer
Vice President, Chief Counsel,
Regulatory and Governmental Affairs
Avista Corporation
1411 East Mission Ave.
Spokane, WA 99202
Phone: (509) 495-4316
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

Mel E. Wach, Owner, Yes Mortgage)	
Complainant,)	
)	CASE NO. AVU-E-16-02
vs.)	
)	RESPONSE OF AVISTA
AVISTA UTILITIES,)	CORPORATION
Respondent.)	
_____)	

Avista Corporation (“Avista” or “Company”) hereby submits its response to the Idaho Public Utilities Commission’s (“Commission”) Summons dated February 1, 2016 regarding the “Formal Complaint of Mel E. Wach, Owner of Yes Mortgage (“the Customer or Yes Mortgage”) Against Avista Utilities.”

The Company appreciates the opportunity to respond to the complaint filed by the Customer.

I. Introduction

The Customer, in his letter to the Commission dated December 29, 2015, stated his desire to file a formal complaint against the Company seeking a refund for incorrect billings from the period of April 2008 to August 2015. Yes Mortgage began receiving service from Avista in April 2008. In October 2015 it was identified that the electric meter installed at Yes Mortgage’s

premise had been switched with the premise adjacent to his. As a result, Yes Mortgage was essentially overbilled from April 2008 to October 2015, as they were paying for electric usage from the neighboring premise, which was in fact higher usage than their actual usage. Per the requirements outlined in rule 204.02.b of the Commission's Utility Customer Relations Rules (IDAPA 31.21.01), Avista provided a refund of \$1,866.20 for overbillings dating back to 2012 or 36 months as allowed per the rule.

Yes Mortgage acknowledges that the period of remediation is 36 months as detailed in the rule mentioned above, however, they are seeking a refund for the billing period of April 2008 – August 2012 for the following reasons described in their formal complaint:

1. This is not a situation of a simple billing error, a malfunction in the meter/other equipment, or a failure to bill but rather it is a situation where we have been billed for another company's usage for over seven (7) years.
2. In this situation, after several months of high bills, Yes Mortgage contacted Avista in August 2008 to address my concerns regarding what they considered to be extremely high bills. Avista responded by sending a technician out to investigate the situation and assured the Customer that everything was in order.
3. In September 2015, the neighboring office, North Idaho Home Health, vacated their office when they moved to another location and Yes Mortgage's bills dramatically decreased. It was obvious to the Customer there was an issue so they contacted Avista. Avista came out and once again, advised that there were no issues; the meter and equipment were performing correctly.
4. In October 2015, Yes Mortgage again contacted Avista and asked that they look at this situation further as there was obviously an issue. It was discovered that the

two (2) meters were incorrectly registered at Avista whereby the Customers usage was being billed to North Idaho Home Health and their usage was being billed to the customer. There was a difference not only in the office square feet, but in the number of employees; therefore, the error negatively affected the Customer for over seven (7) years.

5. If Avista had properly researched the issue back in 2008 when it was first brought to their attention, this situation could have been resolved back then; therefore, we should not be penalized due to their failure to properly address the situation.

II. History of the Dispute

On October 15, 2015, Yes Mortgage contacted the Company requesting that the meter at their location be checked to see if it had been switched with the neighboring premises meter. A field representative from the Company's electric meter shop went to the Customer's location on October 27, 2015 to check for switched electric meters. During that field visit, the representative identified that the electric meters at the Customer's premise and the neighboring premise were indeed switched. On October 21, 2016 a natural gas field representative confirmed that the natural gas meters at the premises were correctly assigned to each premise, therefore the Customer was correctly billed for their natural gas usage.

Upon confirming that the Customer's electric meter was switched with the neighboring premise, the Company then calculated the amount the customer had been overbilled from October 2012, 36 months prior to the discovery of the issue, to July 31st 2015. From July 31, 2015 to the date the error was discovered, the Customer was actually being underbilled as usage from the neighboring premise that they were being billed for was less than their actual usage.

From October 2, 2012 through August 3, 2015, the Customer was billed \$6,268.20 for 58,101 kWhs, but should have been billed \$4,402.00 for 39,591 kWhs. The Company issued a refund for the amount of \$1,866.20 on November 13, 2015 for the amount which they were overbilled during the prior 36 months from the time the error was identified. Also, on November 13, 2015 a field technician corrected the switched electric meters.

The following table provides a summary of the billings for Yes Mortgage and the neighboring premise from April 2008 through July 2015, along with the refund already provided to Yes Mortgage.

Yes Mortgage April 2008 - July 2015 Billed Amount	\$17,148.22
Neighboring Premise April 2008 - July 2015 Billed Amount	\$10,196.04
Amount of Overbilling	\$6,952.18
Amount of Overbilling Refunded from October 2012 - October 2015	\$1,866.20
Amount Not Refunded per IDAPA 31.21.01, Rule 204.02.b	\$5,085.98

In the Customer's formal complaint they are seeking the remaining amount of \$5,085.98 that they were overbilled to be refunded, however, this amount is outside of the allowable remediation period of 36 months described in rule 204.02.b of the Commission's Utility Customer Relations Rules (IDAPA 31.21.01).

III. Additional Information

In the Summons issued on February 1, 2016, the Company was asked to respond to the following questions.

1. Is there evidence (e.g. screen shots of notations in Complainant's account record) of contact by complainant to Avista:
 - a. from June through September 2008?

The Company does not have evidence of contact by the Complainant to the Company, including screen shots or notations, from June through September 2008. If the Customer contacted the Company due to concerns over high bills, the Company would have sent a technician to the Customer's location, as described by the Customer, to test the meter and ensure it was reading accurately. At that time, the technician would have no indication that the meter at the Customer's premise and the neighboring premise could have switched as the Company is not responsible for the wiring of the building where the premises are located.

b. from September through October 2015? If so, please provide and/or describe.

The Company has no evidence of contact by the Complainant to the Company in September of 2015. The first contact on file of the Customer contacting Avista regarding a concern of switched meters at their location was on October 15, 2015. Below are screen shots of notations and activities on the Customer's account from September through October 2015.

Screen Shot #1 – Customer Contact from October 15, 2015

The screenshot displays a software interface with the following elements:

- A search bar containing the number **7536900000** with a magnifying glass icon.
- Text: **Your Equity Source - Primary: (208) 664-9260**
- An **Open** button with an unchecked checkbox.
- A dropdown menu with a downward arrow.
- Text: **User ID L**
- A date and time selector showing **10-15-2015 / 03:03PM**.
- A dropdown menu with **Field Work** selected and a downward arrow.
- A text input field containing **FLDWRK** with a magnifying glass icon.
- Text: **Field Work**
- A scrollable text box containing the note: **Mel Wach - 5658810000-2426 N Merrit Creek Loop Ste A, CDA-ID wanted to check for switched meters, Remember to deleted shield collections once investigation is completed.**

Screen Shot #2 – Natural Gas Field Activity created as a result of Customer contact on October 15, 2015



5650614476	Non Residential Gas/Cycle Day 3/Route 030909/2426 N MERRITT CREEK LOOP STE A, COEUR D ALENE, ID, 83814/Connected
A072	GS-Investigate Switched Meter
Created on 10-15-2015 03:01PM by user LAF3843.	
10-21-2015	/ 12:00AM
Completed	
Priority 50	Eligible for Dispatch <input checked="" type="checkbox"/>
MAXIMO	Maximo
	No Field Order Information
233804	Intermediate Status Mobile User En Route
Please cal Mel Wach @ 727-515-8253, he would like to be here when you check meter. This is located in River Stone behind Idaho Independent Bank, he believes is paying for Suite B.	
10-21-2015 verified space A and meter # 228177 are connected. Confirmed with Mel. All ok on gas side;	

Screen Shot #3 – Electric Field Activity created as a result of Customer contact on October 15, 2015

5650614587	Non Residential Electric/Cycle Day 3/Route 030909/2426 N MERRITT CREEK LOOP STE A, COEUR D ALENE, ID, 83814/Connected
B008	ES-Investigate Switched MTR/Mixed Wiring
Created on 10-15-2015 03:03PM by user LAF3843.	
10-16-2015	/ 12:00AM Reschedule Reason Date Modified by Maximo
Completed	
Priority 50	Eligible for Dispatch <input checked="" type="checkbox"/>
MAXIMO	Maximo
	No Field Order Information
233808	Intermediate Status Onsite
Please cal Mel Wach @ 727-515-8253, he would like to be here when you check meter. This is located in River Stone behind Idaho Independent Bank, he believes is paying for Suite B.	
10-27-2015 Mtrs T12106270 (Rd 14607) and T12106271 (Rd 21518) were switched.;	

Screen Shot #4 – Customer Contact from November 4, 2015


Customer Contact Info Your Equity Source, Billing/Billing, Contacted 11-04-2015





Person ID  7536900000  Your Equity Source - Primary: (208) 664-9260 Open

Preferred Contact Method Use

Contact Date/Time 11-04-2015 / 01:14PM

Contact Class Billing

Contact Type BILLING  Billing



Comments  Edit data - Internet Explorer provided by Avista Corp   

Related Rec
Letter Infor

Mel 5658810000 2426 N Merritt creek- Cust wanted to know when he was going to get his credit - I talked to billing, they said it can take a few weeks. He asked if he is going to get credited for 6 years. - I told him we haven't figured out what side of the fence he is on yet Whether he pd more than what he was suppose to or less. - I let him know we will contact him as soon as we know.

Screen Shot #5 – Notation on Customer account regarding conclusion of bill correction analysis


Customer Contact Info Your Equity Source, Billing/Switched Meter, Contacted 11-13-2015





Person ID  7536900000  Your Equity Source - Primary: (208) 664-9260 Open

Preferred Contact Method Use

Contact Date/Time 11-13-2015 / 09:00AM

Contact Class Billing

Contact Type SWITCHED  Switched Meter

Comments  Edit data - Internet Explorer provided by Avista Corp   

Related Rec
Letter Infor

2426 N Merritt Creek Loop Ste A/acct 5658810000 Per FA 233808 on 10/27/2015 electric meter was switched with acct 3298870000 (2426 N Merritt Creek Loop Ste B)...customer was overbilled until Ste B vacated 7/31/15, billed \$6268.20 from 10/2/12 to 8/3/2015 for 58101 kwhs & should have been billed \$4402.00 for 39591 kwhs. Credited difference of \$1866.20, letter sent to customer to advise, emailed GIS

2. Is there evidence that Avista sent a technician to service Complainant's meter in 2008? If so, please provide and/or describe what the technician did, and what assurances, if any, were made to Complainant regarding Complainant's concerns.

Please see response to Question No.1 above.

3. Does the reimbursement proposed or offered by Avista to Complainant include interest from the date of original collection?

The refund provided to the customer in the amount of \$1,866.20 does not include interest.

4. Is Avista aware of, or does it have any, evidence that Complainant had insulation installed at Complainant's service-site?

The Company is not aware nor does it have any evidence that the Complainant had insulation installed at their location.

IV. Efforts to Resolve

As described above, the Company attempted to resolve this issue promptly after being contacted by the Customer and identifying that the meter at their location was indeed switched with the neighboring premise. The Company issued a refund for the time period allowed per rule 204.02.b of the Commission's Utility Customer Relations Rules (IDAPA 31.21.01).

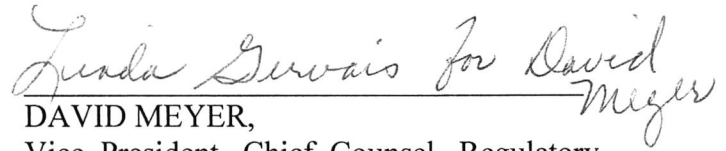
V. Proposed Outcome

The Company has provided Yes Mortgage a refund for the overbilling they experienced as required in rule 204.02.b of the Commission's Utility Customer Relations Rules (IDAPA 31.21.01). There was no way for the Company to know that the meters were switched in this situation as both premises involved were occupied from April 2008 through July 2015 and the meters were accurately recording usage. The Company understands the Customer's concerns and desire to seek a refund back to the time they moved into their location, however the Company has resolved the issue in accordance with rule 204.02.b of the Commission's Utility Customer Relations Rules (IDAPA 31.21.01).

As a result, the Company respectfully requests that the Commission deem Avista's efforts to resolve this dispute to be sufficient and otherwise dismiss this complaint.

Respectfully submitted this 19 day of February 2016.

AVISTA CORPORATION


DAVID MEYER,
Vice President, Chief Counsel, Regulatory
and Government Affairs